

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**IN RE: LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION**

16-md-2687 (JLL) (JAD) (MDL 2687)

**SPECIAL MASTER ORDER NO. 16:  
REGARDING DELTA'S WRITTEN  
DISCOVERY REQUESTS**

This Order rules on Plaintiffs Mayor and City Council of Baltimore (“Baltimore”) and Washington Suburban Sanitary Commission’s (“WSSC”) (collectively, “Plaintiffs”) March 21, 2019 request regarding Defendant Delta Chemical Corporation’s (“Delta”) Interrogatories and Requests for Admission (collectively, “Requests”), asking the Special Master to direct Delta to amend the Requests to no more than 12 Requests and to allow Plaintiffs 21 days to respond to such amended Requests. The Special Master has considered the Plaintiffs’ request, Delta’s response (ECF No. 1252), and the parties’ arguments relating to these Requests made at the March 12, 2019 hearing.

Plaintiffs’ request is **GRANTED in part and DENIED in part** as follows:

(a) Baltimore Requests: Baltimore shall respond to Delta’s Interrogatory Nos. 1-8, 16-18 and 21-24. These Interrogatories relate to allegations made in Baltimore’s complaint and pertain to information within Baltimore’s knowledge. Delta shall withdraw

Interrogatory Nos. 9-15 and 19-20. Interrogatory Nos. 9-15 and 19 pertain to information already within Delta's knowledge or to requests for information that would be more appropriately posed to other Defendants in this matter. Interrogatory No. 20 does not match up to Interrogatory No. 17, which it references.

Baltimore shall respond to Delta's Request for Admission Nos. 1, 17, 18 and 20. These Requests relate to allegations made in Baltimore's complaint and pertain to information within Baltimore's knowledge. Delta shall withdraw Request for Admission Nos. 2-16 and 19. These Requests pertain to information already within Delta's knowledge or to requests for information that would be more appropriately posed to other Defendants in this matter.

(b) WSSC Requests: WSSC shall respond to Delta's Interrogatory Nos. 1-8, 16-18 and 21-24. These Interrogatories relate to allegations made in Baltimore's complaint and pertain to information within Baltimore's knowledge. Delta shall withdraw Interrogatory Nos. 9-15 and 19-20. Interrogatory Nos. 9-15 and 19 pertain to information already within Delta's knowledge or to requests for information that would be more appropriately posed to other Defendants in this matter. Interrogatory No. 20 does not match up to Interrogatory No. 17, which it references.

WSSC shall respond to Delta's Request for Admission Nos. 1, 16, and 17. These Requests relate to allegations made in Baltimore's complaint and pertain to information within WSSC's knowledge. Delta shall withdraw Request for Admission Nos. 2-15 and 18. These Requests pertain to information already within Delta's knowledge or to requests for information that would be more appropriately posed to other Defendants in this matter.

(c) Time to Respond: Plaintiffs shall respond to the above ordered Requests within 14 days of the date of this Order.

**SO ORDERED**

Dated: March 29, 2019

/s/ *Faith S. Hochberg*  
Hon. Faith S. Hochberg, U.S.D.J. (Ret.)  
Special Master